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**Depositions etc.**

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**Alexander Sperber** <asperber@lipsiuslaw.com>

Thu, Oct 19, 2023 at 7:29 PM

To: Phillip Rakhunov &lt;prakhunov@psdfirm.com&gt;

Cc: Avram Frisch &lt;frischa@avifrischlaw.com&gt;, Yisroel Steinberg &lt;ysteinberg@lipsiuslaw.com&gt;, Lauren Riddle &lt;lriddle@psdfirm.com&gt;

Phil,

We just sent you an additional production of emails. I am pressing to make sure that anything left is produced as soon as possible.

Regarding the deposition of Mr. Stern, I would propose agreeing to an additional 1.5 hours to complete the deposition, which we will split evenly (45 minutes each).

Mr. Mendlowitz is available for his deposition on 10/26. Please confirm that date works for you.

I will try to get back to you tomorrow regarding Mr. Banon, and will speak with Mr. Zirkind to find out his availability for a remote deposition.

I am available the entire week of 10/30 for depositions, as my trial has been cancelled. I would suggest scheduling Mr. Weiner for 11/02. Please let me know if Ms. Gajic is available any day that week.

I have not yet received any documents from any of the third-parties that we subpoenaed, except for Medline.

Best,  
Alex

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